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United States Department of Homeland Security

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

GONZALES & GONZALES BONDS
AND INSURANCE AGENCY, INC.,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,

Defendant.

Case No. C 11-02267 DMR

Honorable Donna M. Ryu

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING THE DEADLINE
FOR PLAINTIFF TO FILE MOTION FOR
ATTORNEY'S FEES AND BILL OF
COSTS**

1 Plaintiff Gonzales & Gonzales Bonds and Insurance Agency, Inc. (“G&G” or
2 “Plaintiff”) and Defendant United States Department of Homeland Security (“DHS”), by and
3 through their respective counsel, make the following representations and stipulate and agree as
4 follows:

5 G&G and DHS are continuing to engage in meet and confer efforts regarding G&G’s
6 motion for attorney’s fees and bill of costs based on the Court’s Order of December 21, 2012,
7 which ruled upon the parties’ motions for summary judgment in this Freedom of Information
8 Act case.

9 The current filing deadline for the motion and bill of costs is March 12, 2013. The
10 parties seek to extend this deadline by one week, to March 19, 2013, to allow for additional
11 time to meet and confer. The parties respectfully request that the Court approve this requested
12 extension.

13 This is the third requested extension of the original January 4, 2013 deadline.
14 DHS’ deadline for filing opposition to G&G’s motion for attorney’s fees and bill of costs
15 would continue to be 30 days from the filing of G&G’s motion and bill of costs.

16 The requested extension would not affect the schedule for the case.

17 Nothing herein shall constitute a waiver of DHS’ right to oppose or object to G&G’s
18 motion for attorney’s fees and bill of costs.

1 Respectfully submitted,

2 Dated: March 8, 2013

ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP

3 /s/ David R. Ginsburg

4 Gary A. Nye

David R. Ginsburg

5 Attorneys for Plaintiff

Gonzales & Gonzales Bonds and Insurance

6 Agency, Inc.

7
8 Respectfully submitted,

9 Dated: March 8, 2013

MELINDA HAAG

United States Attorney

10 /s/ Ann Marie Reding

11 ANN MARIE REDING

Assistant United States Attorney

12 Attorneys for Defendant

13 Department of Homeland Security

~~PROPOSED~~ ORDER

Pursuant to the stipulation by the parties, the Court extends from March 12, 2013 to March 19, 2013, the deadline for G&G to file its motion for attorney's fees and its bill of costs. DHS' deadline to file opposition to G&G's motion for attorney's fees and bill of costs will remain 30 days from the filing of G&G's motion and bill of costs.

IT IS SO ORDERED.

Dated: March 11, 2013



THE HONORABLE DONNA M. RYU
UNITED STATES MAGISTRATE JUDGE